

EXHIBIT B

AFFIDAVIT OF MICHAEL S. KRAMER, M.D.

STATE OF TEXAS

COUNTY OF Collin

BEFORE ME, the undersigned affiant, on this day personally appeared Michael S. Kramer, M.D. the undersigned affiant, who swore and affirmed to tell the truth and stated as follows:

"My name is Michael S. Kramer, M.D., I am over 18 years of age, of sound mind, and capable of making this sworn statement;

I have personal knowledge of the following facts stated below and they are true and correct.

I am Dr. Janine Charboneau's personal physician. Dr. Janine Charboneau has a medical condition called "Arachnoiditis" which is an inflammatory condition in the spinal canal that flares with situational stress. It waxes and wanes.

I am requesting deep consideration in the name of fairness and justice of this Honorable Federal Texas Eastern District Court to grant her another extension of time to file a citation on defendants in her Federal case: Cause No. 4:17-CV-00758, that was filed on October 23rd, 2017 against MERS or Mers Corp Holdings, Inc., which is in regards to the title behind her home at 7114 Schafer St. Dallas, Texas 75252. I am requesting you to highly consider accepting any documents or actions that are delayed as timely due to her medical conditions. She has a "heat intolerance" as part of this condition which at times temporarily impairs her performance in her legal writing which is currently causing a problem. Flare ups of the Arachnoiditis are out of her control. This

causes severe burning pain from the waist down and other neurological symptoms. She also is currently dealing with a high blood pressure issue, which also flares due to an increase of adrenaline with stress.

I have known her for over 9 years. She diligently presses on with an extreme amount of effort to try and comply with requests and requirements. She is highly capable and accomplished, but at times her medical conditions may limit her capabilities and as a result, she is not always successful at meeting high demands simultaneously placed on her.

It is my understanding that she has had to be out of town to assist an elderly mother with a flooded basement from the end of May to June 10th or 11th, 2018. I also understand that she has had to file a motion for rehearing in the Texas Supreme Court in June 2018 (6-15-18), had to file for an extension of time to file an Appendix to the motion for rehearing (6-29-18) in the same court, filed a motion for an extension of time to file an Amended Appendix to the motion for rehearing (7-2-18), again in the Texas Supreme Court, and filed an Amended or Second Appendix to the motion for rehearing, also in the Texas Supreme Court on July 3rd, 2018, and it has now been requested by the Texas Supreme Court for her to file a motion for an extension of time to file a 2017 filed Petition for Review in the Texas Supreme Court in another case that was claimed untimely, all while or around when she was also to be serving a citation on Defendants in this Federal Case against Mers or Mers Corp Holdings, Inc. that was filed on October 23rd, 2017.

I am requesting special consideration due to her medical conditions to grant her another extension to serve any citations on defendants in her currently pending Federal case and to highly consider excusing

delays in getting documents in timely on this case due to her medical conditions.

Michael M.D.

Michael S. Kramer, M.D., Affiant

State of Texas

County of *Collin*

SWORN to and SUBSCRIBED before me, the undersigned authority and affiant on the *9th* day of July, 2018 by

Michael M.D.

Michael S. Kramer, M.D.

Jeri Uyokpeyi
Notary Public, State of Texas

Seal

my commission expires:

5-6-22

